

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

STEVEN B. BARGER,

Plaintiff,

v.

Civil Case No. 1:17-cv-04869-FB-LB

FIRST DATA CORPORATION, *et al.*,

Defendants.

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S TRIAL WITNESS LIST

Defendants First Data Corporation, Frank Bisignano, Dan Charron, Anthony Marino, and Rhonda Johnson, by and through their undersigned counsel, respectfully submit the following objections to Plaintiff's proposed trial witness list (*see* ECF No. 109). Defendants reserve the right to amend or modify any of the objections set forth herein on the basis of any stipulation entered into by the parties, corrections, revisions, or other modifications to the underlying exhibits, any order from the Court on outstanding motions, and any ruling from the Court impacting admissibility.

WITNESS (First Name, Last Name)	Live or By Deposition	Defendants' Objection
Michael Cianfichi	Live	Objection. Rule 501; Attorney-Client Privileged Communication. New York RPC Rule 4.4(b); Rule 402. Rule 801. See also ECF No. 23 (Stipulation and Order Regarding Confidentiality of Discovery Material)Mr. Cianfichi is an attorney representing Defendants in this matter. See also Defendants' Objections to P-135.

Gary Eidelman	Live	See ECF No. 112, Plaintiff's letter dated September 2, 2019, identifying Mr. Eidelman as a possible witness. Objection. Rule 501; Attorney-Client Privileged Communication. New York RPC Rule 4.4(b); Rule 402. Rule 801. See also ECF No. 23 (Stipulation and Order Regarding Confidentiality of Discovery Material) Mr. Eidelman is an attorney representing Defendants in this matter. See also Defendants' Objections to P-135.
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/s/ Gary B. Eidelman

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Dated: September 5, 2019